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12 ASSOCIATION OF GOVERNMENTS

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

KENT W. EPPERSON,  
Plaintiff,  
vs.  
SANTA BARBARA COUNTY  
ASSOCIATION OF GOVERNMENTS  
("SBCAG"),  
Defendant.

Case No. 2:23-cv-03039-AB-(MRWx)

**DEFENDANT SANTA BARBARA  
COUNTY OF ASSOCIATION OF  
GOVERNMENTS' NOTICE OF  
MOTION FOR SUMMARY  
JUDGMENT PURSUANT TO FRCP  
RULE 56**

[Filed Concurrently with Memorandum  
of Points and Authorities; Separate  
Statement; Declarations; Appendix of  
Evidence; and Proposed Order]

Date: January 17, 2025

Time: 10:00 a.m.

Crtrm.: 7B

Pre-Trial Conf: August 1, 2025  
Trial Date: August 26, 2025

**TO THE COURT, PLAINTIFF AND ITS ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on January 17, 2025, at 10:00 a.m., or as soon thereafter as the matter may be heard in Courtroom 7B of the above-entitled courthouse, located at 350 West First Street, Los Angeles, CA 90012, Defendant SANTA BARBARA COUNTY OF ASSOCIATION OF GOVERNMENTS

148789837.1

DEFENDANT SANTA BARBARA COUNTY OF ASSOCIATION OF GOVERNMENTS' NOTICE OF MOTION  
FOR SUMMARY JUDGMENT PURSUANT TO FRCP RULE 56

1 (“Defendant” or “Santa Barbara”) will and hereby does move for summary judgment  
2 as to Plaintiff KENT W. EPPERSON’s (“Plaintiff” or “Epperson”) claim pursuant to  
3 Federal Rule of Civil Procedure 56.

4 **This motion is made following the conference of counsel pursuant to Local  
5 Rules-Central District of California 7-3 which took place on Monday, October  
6 28, 2024.** (Declaration of Brian K. Katoozi, ¶4.)

7 Defendant is entitled to summary judgment as to Plaintiff’s sole cause of  
8 action for discrimination in employment pursuant to Title VII of the Civil Rights  
9 Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender,  
10 religion, national origin) because there is no genuine issue of material fact, and  
11 Plaintiff has not established, and cannot establish, all elements of this cause of  
12 action. Specifically, it’s undisputed that Defendant did not discriminate against  
13 Plaintiff during his employment based on his religion, and instead attempted to  
14 reasonably accommodate Plaintiff’s alleged religious beliefs.

15 This Motion is based on this Notice of Motion, the Memorandum of Points  
16 and Authorities attached hereto, the herewith lodged proposed Statement of  
17 Uncontroverted Facts and Conclusions of Law, the Court’s file in this action, the  
18 Declaration of Martha Gibbs, the Declaration of Brian K. Katoozi, matters of which  
19 this Court must or may take judicial notice, and on such further evidence and  
20 argument Defendant may present before or at the hearing on this matter.

21 DATED: November 13, 2024 STEVEN G. GATLEY  
22 BRIAN KATOOZI  
23 LEWIS BRISBOIS BISGAARD & SMITH LLP

24 By: /s/ Brian Katoozi  
25 BRIAN KATOOZI  
26 Attorney for Defendant, SANTA  
27 BARBARA COUNTY OF  
ASSOCIATION OF GOVERNMENTS  
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**CALIFORNIA STATE COURT PROOF OF SERVICE**  
Kent W. Epperson v. Santa Barbara County Association of Governments  
Case No. 2:23-cv-03039-AB-(MRWx)

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and not a party to this action. My business address is 650 Town Center Drive, Suite 1400, Costa Mesa, CA 92626.

On November 13, 2024, I served true copies of the following document(s):  
**DEFENDANT SANTA BARBARA COUNTY OF ASSOCIATION OF  
GOVERNMENTS' NOTICE OF MOTION FOR SUMMARY JUDGMENT  
PURSUANT TO FRCP RULE 56**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Kent W. Epperson Plaintiff, Pro Se  
5801 West Camino Cielo  
Santa Barbara, CA 93105  
Telephone: (805) 681-8252  
E-Mail: [KentWEpperson@proton.me](mailto:KentWEpperson@proton.me)

The documents were served by the following means:

- (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above.

I declare under penalty of perjury under the laws of the State of California  
that the foregoing is true and correct.

Executed on November 13, 2024, at Costa Mesa, California.

/s/ Jane Donovan

Jane Donovan